



P.O. Box 388  
Kanab, UT 84741  
435-644-5801

BUREAU OF LAND MANAGEMENT  
ARIZONA STRIP FIELD OFFICE  
MAR 11 2011

March 9, 2011

Scott Florence, District Manager  
BLM Arizona Strip Office  
345 East Riverside Drive  
St George, UT 84790-6714

Dear Mr. Florence,

I have been reviewing the draft EIS for the northern Arizona withdrawal. I feel that much of the work is fair and accurate. After extensive review of the document I have concluded that the 45 days allotted for public response is far too short a time, giving the impression that the Federal Government is attempting to "cram it down the throats" of the public. There is significant material presented in the draft with which I and other people knowledgeable about the withdrawal area disagree, however a reasonable amount of time is required for research to document and provide details concerning our facts. Over the past 35 years I have spent several thousand days in the field and working with data on the withdrawal area, and ask that I be given a fair opportunity to contribute from my experience.

Most of the individuals and groups wishing to comment on the withdrawal do not have on their staffs experts in all the disciplines touched on in the draft, therefore it is necessary to contract experts in some of the fields. Some experts we have contacted are reluctant to get involved due to fear of reprisal by some of the government agencies by way of not hiring them for future work. Thus finding experts is taking additional time.

Some of the government agencies (not the BLM) which have contributed to the draft have been openly opposed to mining for many years. I cannot believe that their conclusions and presentation of data are as objective as they would be if these agencies were neutral. Some of these same agencies in the past have accepted data and information from the radical anti-development groups including but not limited to the Grand Canyon Trust, the Sierra Club, and the Center for Biological Diversity. Many of the people from these groups who have provided information have no professional credentials and have been known to make up facts to suit their own purposes. Thus even more time is required to counter prejudiced conclusions and bad information.

I, and many of the other people responding to the draft, feel that a minimum of 90 days, and more if possible, are needed for an objective and fair response.

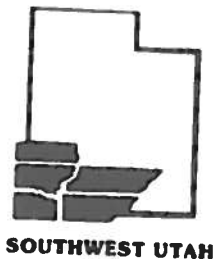
  
Patrick Hillard



# Five County Association of Governments

1070 West 1600 South, Building B  
St. George, Utah 84770

Fax (435) 673-3540



Post Office Box 1550  
St. George, Utah 84771

Office (435) 673-3548  
BUREAU OF LAND MANAGEMENT  
ARIZONA STRIP FIELD OFFICE

MAR 11 2011

March 9, 2011

Northern Arizona Proposed Withdrawal Project  
ATTN: Scott Florence, District Manager  
Bureau of Land Management  
Arizona Strip District Office  
345 East Riverside Drive  
St. George, UT 84790-6714

Delivered Via Email to: [azasminerals@blm.gov](mailto:azasminerals@blm.gov)

Dear Mr. Florence:

Thank you for the opportunity to review and comment on the Draft Environmental Impact Statement regarding the proposed withdrawal of lands in northern Arizona from the Mining Law of 1872. Northern Arizona contains some of the highest grade uranium deposits in the nation. In a time when the country is in desperate need to lessen dependence on imported energy resources and nuclear power generation will be a vital part of the national long-term energy strategy, it is folly to withdraw some of the best proven uranium resources on federal lands from use.

Mining practices and reclamation activities in recent decades on the Arizona Strip demonstrate that mining can occur with little or no impact to the surrounding environment. The Draft EIS also documents only minor impacts to the resources analyzed in all alternatives. Past Resource Management Plans and mining reclamation plans have shown that surface disturbance is relatively small, and that little or no long-term impacts result from the extraction of uranium resources.

The Draft EIS notes that less than 1,000 acres of the 1,000,000 acres to be withdrawn are expected to be impacted by mining activities. No appreciable impacts to water, soil, wildlife or other resources are documented. However, there is a substantial positive benefit to the national and regional economies if mining is allowed to continue. The Draft EIS and proposed alternative do not substantiate a rational basis for the proposed withdrawal.

Local elected officials in southwestern Utah assert that no rational basis for the proposed withdrawal is documented in the Draft EIS. Current Resource Management Plans adequately protect resources and manage mineral production. The nation must keep a vital, known energy resource available for prudent use.

Sincerely,

Chad W. Johnson  
Chairman

cc: Kane County Commissioners  
Washington County Commissioners  
Senator Hatch  
Senator Lee  
Representative Matheson  
Representative Chaffetz  
Representative Bishop